

## **Trident Seafoods Anacortes Plant**

P.O. Box 954

Anacortes, Washington 98221

State Waste Discharge Permit No. ST-7397

### **FIRST ADDENDUM TO FACT SHEET**

August 30, 2005

This is the first addendum to the fact sheet accompanying State Waste Discharge Permit No. ST-7397, issued to Trident Seafoods Corp.

The Department of Ecology is proposing to modify State Waste Discharge Permit No. ST-7397, which was issued to Trident Seafoods Corp. on December 15, 2003, conditioned the discharge of pretreated process wastewater to the City of Anacortes Wastewater Treatment Plant (WWTP). Trident Seafoods, Anacortes Plant, and the Anacortes WWTP informed the Department on March 17, 2005, that they reached a new wastewater discharge agreement. The new agreement increased the allowable discharge of flow, biochemical oxygen demand and total suspended solids from Trident to the Anacortes WWTP.

The following changes are proposed to the Trident Seafoods-Anacortes state wastewater discharge permit:

<b>Parameter</b>	<b>Existing Limitations</b>	<b>Proposed Limitations</b>
Flow, daily max, gpd	30,000	<b>45,000</b>
Flow, monthly max, gpm	550,000	<b>800,000</b>
BOD, lbs/day	93	<b>230</b>
TSS, lbs/day	10	<b>130</b>

Sampling for BOD and TSS shall be changed from monthly to weekly. The strength of the discharge and potential impact on the wastewater treatment plant is significant and therefore weekly monitoring is justified. The following footnote has been added to the permit:

<sup>C</sup> The samples shall be taken during peak weekly discharge and shall be representative of the maximum discharge.

## DECISION

Ecology has agreed to modify State Waste Discharge Permit No. ST-7397 to reflect the conditions in the new wastewater discharge agreement between Trident Seafoods and the City of Anacortes.

## PERMIT MODIFICATIONS

The Department is proposing to modify State Waste Discharge Permit No. ST-7397 as follows:

Parameter	Limitations	Monitoring Frequency
Flow, daily max, gpd	45,000	daily
Flow, monthly max, gpm	800,000	daily
BOD, lbs/day	230	weekly <sup>c</sup>
TSS, lbs/day	130	weekly <sup>c</sup>
<sup>c</sup> The samples shall be taken during peak weekly discharge and shall be representative of the maximum discharge.		

The changes made in this permit are consistent with WAC 173-216-120. Trident Seafoods has requested these permit changes, with the written approval of the City of Anacortes. A copy of the signed agreement between the City of Anacortes and Trident Seafoods is attached.


## PUBLIC NOTICES

The proposed changes made in this permit are considered to constitute a major modification under 40 CFR 122.63. Thus, the changes made in the above-referenced permit are required to be published for a thirty (30)-day public review and comment period.

The Department published a Public Notice of Modification (PNOM) on September 2, 2005, in the *Skagit Valley Herald* to inform the public that a draft permit modification was available for review. Interested persons were invited to submit written comments regarding the draft permit modification. No comments were received.



## Memo

Date: March 17, 2005  
To: Lori Levander  
From: John Franz   
Re: Trident Seafoods SWD Permit

The City of Anacortes and Trident Seafoods have reached a new wastewater discharge agreement. This new agreement is significantly changed from the old agreement. Trident Seafoods wishes to modify the discharge limits in the State Waste Discharge permit to reflect changes in production and the limits in the new agreement.

The City of Anacortes is willing to accept the following limits in Trident Seafoods new or revised SWD permit:

1. Flow, daily maximum, gallons/day	45,000
2. Flow, monthly max, gallons/month	800,000
3. BOD, lbs/day	230
4. Solids, Total Suspended, lbs/day	130
5. Oil and Grease, mg/l	100
6. pH, minimum	6.0
7. pH, maximum	9.0

CITY OF ANACORTES  
INDUSTRIAL WASTEWATER DISCHARGE AGREEMENT  
(Updating and Replacing a March 1998 Agreement)

The City of Anacortes (City) agrees to accept process wastewater from Trident Seafood Corporation (Trident) for treatment in the City's secondary wastewater treatment facility.

Acceptance of this waste is subject to the following conditions:

- 1) The amount of waste discharged to the sewer system shall be limited to the following maximum quantities:
  1. Volume = 7,464,000 gallons/yr
  2. Waste strength <601 mg/l BOD or TSS
- 2) Waste quantity and strength shall be monitored randomly by the City of Anacortes for the duration of this agreement. The City shall inform Trident of the results of all tests performed on samples collected from Trident's waste stream.
- 3) The annual volume figure is to be based upon figures recorded on Trident's sewage flow meter.
- 4) If volume and/or waste strength monitoring by the City indicates quantities or concentrations greater than those described above, the City will automatically impose the following discharge penalties:
  - (1) Penalties for the concentration of BOD or TSS in excess of the limit shall be based on an annual average. The annual average shall be the average of the results of all tests performed during a calendar year. The penalty shall be a fifty percent surcharge on the sewer rate applied to the entire volume of wastewater generated during the year that the excursion occurred.
  - (2) Penalties for exceeding the limit on volume shall be based on the total volume of sewage generated per calendar year. If the total volume of sewage generated during a calendar year exceeds the annual limit, a fifty percent surcharge on the sewer rate shall be applied. This surcharge shall apply only to the quantity of sewage that exceeded the limit. The surcharge shall not apply to the entire annual volume of sewage generated.
  - (3) If during the same year both limits are exceeded only the greater of the penalties shall apply.
  - (4) The calculation to determine if the limits have been exceeded shall be performed in January of each year for the previous year. If a penalty is due Trident shall be invoiced the penalty amount during the next utility billing cycle.
- 5) Waste discharges shall otherwise comply with all requirements of the City's sewer Ordinance No. 2155, and industrial pretreatment Ordinance No. 1945, and all amendments thereto.
- 6) Trident shall pay sewer rates for the waste discharged to the City sewer system according to the conditions and rates established in the City's sewer rate Ordinance No. 2155, and all amendments thereto.

- 7) In addition to the General Facilities Charge (GFC) of \$157,516.00 representing and ERU of fifty-three (53) paid by Trident in 1993, and a GFC of \$217,206.00 representing an ERU of sixty-six (66) agreed to by Trident in 1998, Trident shall pay a GFC of \$117,050 representing twenty-five (25) additional ERU for a total commitment of 144 ERU's. Additional GFC's may be incurred if Trident wishes to expand or modify its facilities resulting in an increase to the discharge quantities or concentrations established above; increase in waste discharges shall be subject to available capacity at the treatment plant and negotiation with the City on acceptable waste discharge quantities.
- 8) This agreement will remain in effect for a period of 20 years or until a 15% increase above the permitted volume or character of the wastewater beyond current annual limits. In that case additional ERU's will be required to be purchased.

The conditions described above are agreed to and accepted by the City of Anacortes and Trident Seafoods on the 29<sup>th</sup> day of November, 2004.

CITY OF ANACORTES:

TRIDENT SEAFOODS:

N. Dean Marshall Signature  
MAYOR Title  
11/18/04 Date

ED Tostemund Signature  
GENERAL MANAGER Title  
November 29, 2004 Date



City of Anacortes  
2 Second Floor  
0433504-2 11/30/2004 BR2 T9  
Tue Nov30,2004 10:05AM Trans#1-1  
Name: TRIDENT SEAFOODS CORP  
1 117,050.00 2022 - Sewer-General Faci  
1 ITEM(S): TOTAL: \$117050.00  
Check PAID \$117050.00

Working together to serve you better.

0433504-2 0001 11/30/2004 002 9  
Sewer-General Facilities Charge \$117,050.00

## **Exhibit 1**

### **Parameter Limits:**

Flow = 7,464,000 Gallons

BOD or TSS = < 601 mg/liter

The annual flow limit shall be computed using the following formula:

Current year December sewage flow meter reading – Previous year December sewage flow meter reading / number of days between meter readings x 365 = annual total sewage flow

The annual BOD or TSS average shall be computed from the total of all reported test results divided by the number of test results reported.

Additional GFC must be purchased when the sewage flow or strength exceeds the parameter limits by more than 15%. The GFC limits are as follows:

### **GFC Limits:**

Annual Sewage Flow > 8,583,600

Annual Average BOD or TSS > 690 mg/liter